

Sgt. Mark Rowlands
December 18, 2020

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

ADA ANGLEMEYER, :NO: 19-CV-3714-JMY
:
Plaintiff, :
:
- vs - :
:
NORTHAMPTON COUNTY, :
et al., :
:
Defendant. :
- - - - - :

Friday, December 18, 2020

- - -

VIDEOCONFERENCE TRANSCRIPT OF
DEPOSITION OF SGT. MARK ROWLANDS, taken
by and before ALEXANDRA ALVARADO,
Professional Reporter and Notary Public,
commencing at 11:45 a.m.

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SUMMARY
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APPEARANCES:

THE ZEIGER FIRM

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(By agreement of counsel, the reading, signing, sealing, filing, and certification of the transcript have been waived; and all objections, except as to the form of the question, have been reserved until the time of trial.)

SGT. MARK ROWLANDS, after having been duly sworn, was examined and testified as follows:

It is hereby stipulated and agreed by and between counsel for all parties present that Pursuant to 231 Pa. Code section 4002 this deposition is to be conducted by video conference, that the court reporter, all counsel, and the witness are all in separate remote locations and participating via Videoconference (LegalView/Zoom) meeting, that the officer administering the oath to the

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By: Mr. Zeiger

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witness need not be in the place of the deposition and the witness shall be sworn in remotely by the court reporter after confirming the witnesses' identity, that this video conference will not be recorded in any manner and that any recording without the express written consent of all parties shall be considered unauthorized, in violation of law, and shall not be used for any purpose in this litigation or otherwise.

It is further stipulated that exhibits may be marked by the attorney presenting the exhibit to the witness, and that a copy of any exhibit presented to a witness shall be emailed to or otherwise in possession of all counsel prior to any questioning of a witness regarding the exhibit in question. All parties shall bear their own costs in the conduct of this

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<p>1 deposition by video conference. 2 --- 3 DIRECT EXAMINATION 4 --- 5 BY MR. ZEIGER: 6 Q. Sir, can you state your 7 rank? 8 A. Sergeant. 9 Q. If I call you Sergeant 10 Rowlands is that okay with you today? 11 A. That's fine. 12 Q. Nice to meet you. 13 A. You too, sir. 14 Q. Thanks for coming today. 15 We're here to talk about a case involving 16 Anglemeyer family and the residence. Do 17 you remember that job? 18 A. Yes, sir. 19 Q. And so you prepped the guys 20 that went into the house in advance of 21 them going into the house; is that 22 correct? 23 A. Prep is a loose word. I 24 mean I oversaw the briefing and the</p>	<p>1 this would be 0400 hours, we met at State 2 Police Barracks Belfast, did an overall 3 briefing. 4 I kind of give the overall 5 briefing of everything, why we're here, 6 what's going to happen and then it gets 7 broken down into -- our whole report gets 8 spread block to block. 9 And then team leaders -- 10 this one had three different structures 11 we were dealing with plus our counter 12 sniper coverage. So they each went into 13 a detailed briefing of what's going to be 14 expected for what they're in charge of. 15 And then intelligence people, our 16 negotiators went over the intel report. 17 We did rehearsals and then we served a 18 search warrant. 19 It's kind of an overview of 20 me and my job just to oversee everything, 21 our legal authority for being there, make 22 sure it meets our criteria, makes sure 23 guys come up with a good plan and go from 24 there.</p>
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<p>1 preplan of everything and then the 2 specific team leaders kind of went more 3 in depth on the more planning of 4 everything. 5 Q. Can you explain for us what 6 that means? 7 A. From the beginning? I can 8 -- so when this first happened I took a 9 call from Detective Michael Enstrom from 10 Northampton County Task Force requesting 11 our assistance to do a search warrant at 12 this residence. 13 Based on the information he 14 told me, at face value it met our 15 criteria that we could do a further 16 invest meeting, what we call preplan for 17 this operation. 18 Fast forward, we meet with 19 the detectives, do a preplan, get all the 20 information we need, verify a couple 21 things. And then once we know it meets 22 our threshold per our matrix we go 23 forward with planning of the warrant 24 service and the day -- the morning of, so</p>	<p>1 Q. Once they leave that 2 facility in the morning, do you have 3 anything to do with this case? 4 A. On our way to the warrant 5 service? 6 Q. Like do you go with them? 7 A. Correct. 8 Q. Are you in the car? 9 A. I'm usually in the BearCat 10 for all overall command of it just to 11 make sure everything goes smooth and make 12 sure we're good on time. And if any -- 13 on the fly decisions that can be made 14 that's aren't directive action of 15 immediate response, I'm there to handle 16 that. 17 And if it ends up going into 18 a barricade incident I'm there to run it 19 from our end as well as a top com we 20 would use. 21 Q. And in this case did you 22 actually do that? Were you in that 23 BearCat? 24 A. I was. So I was outside the</p>

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<p>1 whole time. I go in at the very end just 2 to see what's going on for this one just 3 to -- because it was reported someone 4 claiming injury. I went in there to see 5 it and bring our medics in. 6 Q. And do all the guys wear the 7 same uniforms? 8 A. Yes. Loosely. I mean, when 9 it comes to the shirts underneath they 10 might change, but as far as pants, our 11 protective vest, our helmets things, like 12 that, yes. 13 The operator has their 14 individual add-ons to them, but in 15 general, yes everything's the same. 16 Q. Are the names displayed on 17 the uniforms? 18 A. They are not. 19 Q. They are not? 20 A. Correct. 21 Q. Can you tell us why they're 22 not if you know? 23 A. I do not know. It's not a 24 requirement. I've been on our team since</p>	<p>1 A. I never really thought about 2 it. In my honest opinion, I wouldn't 3 want our guys wearing their names under 4 the uniform. 5 Q. Why wouldn't you want them 6 wearing their names? 7 A. It's just my personal 8 opinion. We deal with a lot of 9 individuals, heavy drug dealers, people 10 involved in gangs, OMGs, drug cartels. 11 If I could prevent them from having 12 immediate access to an individual's name, 13 I'd prefer that for fear of any type of 14 retribution. 15 In the long run through 16 court they'll get the informations, the 17 officer's information anywhere. That's 18 just my opinion on the whole thing. 19 Q. Well, if something goes 20 wrong in an operation then how are you 21 able to know what happened and who is the 22 person that made the mistake? 23 MR. BRADFORD: Objection. 24 You can answer.</p>
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<p>1 2009. It's something we never did. 2 Something that's never been brought up to 3 me. So we just -- 4 Q. Sorry. I never mean to 5 speak over you. 6 A. It's going to happen. No, I 7 get it. No problem. I don't take 8 offense to it. 9 Q. Have you ever complained to 10 anyone, be it a supervisor, a spouse, 11 anyone at all about the fact that your 12 names are not on your uniforms when you 13 go into a job? 14 MR. BRADFORD: I'm going to 15 object to the spouse, that's 16 spousal privilege. 17 MR. ZEIGER: Of course. 18 MR. BRADFORD: I don't know 19 why you included that. 20 MR. ZEIGER: I got it. 21 THE WITNESS: No, I have 22 not. 23 BY MR. ZEIGER: 24 Q. Why not?</p>	<p>1 THE WITNESS: What's that? 2 MR. BRADFORD: I'm just 3 objecting for the record, but can 4 you answer, Mark. 5 THE WITNESS: I can? 6 MR. BRADFORD: Yes. 7 THE WITNESS: Because after 8 it's done with, we do a debrief of 9 everything that occurred, an 10 overview and then I can find out 11 who did what at what point. 12 That's why I find out -- or it 13 gets called out over the radio. 14 BY MR. ZEIGER: 15 Q. So today your testimony is 16 that it's intentional that the people's 17 name are not put on their uniform? 18 MR. BRADFORD: Objection. 19 THE WITNESS: What did you 20 say? 21 BY MR. ZEIGER: 22 Q. It is your testimony 23 therefore that is intentional that the 24 officers's name are not put on their</p>

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<p>1 uniform?</p> <p>2 A. I never said that. Not</p> <p>3 intentional. Just not a requirement for</p> <p>4 us to do. If they said we had to do it</p> <p>5 then we'd do it.</p> <p>6 Q. Who's they?</p> <p>7 A. Command staff above me. Way</p> <p>8 above my pay grade. I just gave you my</p> <p>9 personal opinion. That's it. Nothing --</p> <p>10 for the record I'm not saying we</p> <p>11 shouldn't, we should. We just don't.</p> <p>12 Q. I'm sorry, Sergeant, I just</p> <p>13 have to ask more questions down this road</p> <p>14 unfortunately based on your answers. I</p> <p>15 mean it in the most respectful way.</p> <p>16 A. I get it.</p> <p>17 Q. Who are the supervisors who</p> <p>18 make these decisions? I mean the buck</p> <p>19 has to stop somewhere.</p> <p>20 A. I'd say the commissioner. I</p> <p>21 mean we have -- so my position, I have a</p> <p>22 lieutenant above me, a captain above me,</p> <p>23 a major above me, deputy commission of</p> <p>24 operations above me and then the colonel,</p>	<p>1 first it's ever actually been brought up</p> <p>2 to me in anything I've been a part of.</p> <p>3 Q. So then is it fair to say</p> <p>4 based on that answer you don't know who</p> <p>5 the decision maker is as far as why the</p> <p>6 names are not on the uniform?</p> <p>7 A. Correct.</p> <p>8 Q. And so your view that it's</p> <p>9 okay to not have them on the uniforms is</p> <p>10 just your personal view?</p> <p>11 A. Yes.</p> <p>12 Q. But also based on your</p> <p>13 experience you think -- you find it</p> <p>14 personally to be appropriate to not have</p> <p>15 the names on the uniforms, but you're not</p> <p>16 giving the position as the Pennsylvania</p> <p>17 State Police, you're just saying in your</p> <p>18 view as the sergeant in charge of these</p> <p>19 jobs you think it's okay not to have the</p> <p>20 names on the uniform?</p> <p>21 A. Yes.</p> <p>22 Q. In this case that we're here</p> <p>23 for today, did you have an opportunity to</p> <p>24 debrief afterwards?</p>
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<p>1 the state police above me.</p> <p>2 Q. I know, but when you say the</p> <p>3 commissioner, I mean commissioner of</p> <p>4 what? What does that mean?</p> <p>5 A. The Pennsylvania State</p> <p>6 Police.</p> <p>7 Q. Is the commissioner the top</p> <p>8 ranked person --</p> <p>9 A. Correct.</p> <p>10 Q. -- is the state police?</p> <p>11 A. Correct. Appointed by the</p> <p>12 governor.</p> <p>13 Q. I mean, again in a</p> <p>14 respectful way, none of these titles mean</p> <p>15 a thing to do me. Do you know what I</p> <p>16 mean? I don't have anything to do with</p> <p>17 the state police. So when you say these</p> <p>18 things to me --</p> <p>19 A. There's several levels above</p> <p>20 me and there's -- I'm sure there's</p> <p>21 studies of why we wear name tags, why we</p> <p>22 don't at certain times of operations for</p> <p>23 our members. And it's just -- I came on</p> <p>24 in 2009, we never wore them. This is the</p>	<p>1 A. Yes.</p> <p>2 Q. And did you have an</p> <p>3 opportunity to know which troopers came</p> <p>4 in personal contact with which people</p> <p>5 they located in the house?</p> <p>6 A. During the debrief each</p> <p>7 person would have talked about where they</p> <p>8 went, who they came in contact with. By</p> <p>9 name I probably wouldn't -- I wouldn't</p> <p>10 know.</p> <p>11 Q. Did you take notes for write</p> <p>12 down anything that indicated, you know,</p> <p>13 which trooper came in contact with which</p> <p>14 human inside the house?</p> <p>15 A. No, because they're going to</p> <p>16 -- they should be documented that on</p> <p>17 their individual records.</p> <p>18 Q. And if they don't document</p> <p>19 on their own individual report what can</p> <p>20 do then to which human being came in</p> <p>21 contact with which trooper?</p> <p>22 A. Could ask more -- I mean if</p> <p>23 I need to follow up with anything I just</p> <p>24 talk to them and follow up on what</p>

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<p>1 happened or who they came into contact 2 with. A lot of people aren't going to 3 give names. They'll just give a brief 4 description, came into contact with a 5 male individual, a female, et cetera. 6 Q. So in the case that we're 7 here for today, there's two individuals 8 in the house who claim they were in 9 contact with troopers and they're unable 10 to identify the person by name because 11 they don't have name tags on their 12 uniforms. And none of the troopers who 13 were sent in will admit that they were 14 the people that had contact with them. 15 Are you aware of that? 16 MR. BRADFORD: Objection to 17 form. You can answer. 18 THE WITNESS: Could you 19 repeat that question? 20 BY MR. ZEIGER: 21 Q. There's two gentlemen that 22 were in the house that claim they were 23 touched by members of the Pennsylvania 24 State Police, but they don't know their</p>	<p>1 protecting the officers by not having 2 their names on their -- and I get that 3 and I respect it very much and I want all 4 the state troopers to be safe. 5 But at the same time then 6 you're telling me, well, when we do the 7 debriefing we don't have the names down. 8 So it's a catch-22. So no matter what I 9 ask your answers are such where it's like 10 we just don't know. 11 So I'm trying to ask you 12 what happened in a case like where we 13 can't identify the names of the troopers 14 that came in contact with the civilians? 15 A. Okay. I don't know how to 16 answer that question. 17 MR. BRADFORD: I think his 18 answer is I don't know. He 19 explained to you about the name 20 tags. I mean, we can go in 21 circles here if you want. 22 BY MR. ZEIGER: 23 Q. I would just think they're 24 troopers they want to -- but they would,</p>
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<p>1 names because you guys don't wear name 2 tags on your state uniforms. And the 3 troopers who were in the house, none of 4 them will admit that they had any contact 5 with these two gentlemen. So if there's 6 nothing written down and you don't do a 7 debriefing to get everybody's names, how 8 do you deal with that? 9 A. I don't know how to answer 10 that for you, sir. 11 Q. Is your unit -- is your 12 assignment a SERT unit, is that what you 13 do all the time? 14 A. Yes, SERT coordinator for 15 the eastern team. 16 Q. As the SERT coordinator is 17 there any kind of secret operation? Is 18 there anything -- again, I don't know you 19 guys. 20 I'm just trying to figure 21 out how it's possible that you send guys 22 into a house and no one knows the names 23 of the people that touched the humans and 24 you're telling me all this stuff about</p>	<p>1 they hold themselves to the higher 2 standards than anyone else from my 3 interactions with troopers. But okay. I 4 understand. 5 What about body cams? Did 6 they have body cams on when they went 7 into this operation? 8 A. Our department doesn't even 9 use body cams at this point. So we 10 wouldn't have them. 11 Q. Do you know why not? 12 A. No. It's -- again way above 13 my pay grade, sir. 14 Q. Understood. Have you ever 15 complained to anyone and said, hey, we 16 need to have body cams? 17 A. I have not. 18 Q. Why not? 19 A. To me it's a pointless thing 20 because our department doesn't even have 21 them. They would have to do -- I mean 22 there's a long process for us to get 23 anything. So we don't have them. So 24 it's something I never even thought of.</p>

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<p>1 Q. But if you guys had body 2 cams you probably wouldn't be here today? 3 A. I can't answer that for you. 4 Q. Were there any cameras or 5 video cameras at all on this entire 6 operation, whether they were on humans or 7 outside on vehicles, anywhere at all? 8 A. Not that I'm aware of. 9 Q. Why not, if you know? 10 A. We don't have cameras. 11 Q. Do you know why not? 12 A. I don't. 13 Q. Have you ever complained to 14 anyone about having cameras or not having 15 cameras? 16 A. No. 17 Q. Do you know -- do regular 18 patrol cruisers for the troopers, like 19 uniformed troopers making car stops, do 20 they have cameras in the car? 21 A. Yes, all marked units have 22 MVRs. 23 Q. What are MVRs? 24 A. Mobile video recorders, so</p>	<p>1 THE WITNESS: I do not. 2 BY MR. ZEIGER: 3 Q. Okay. I'm going now to show 4 you a document and then we're going to go 5 through the document. Okay? Sound good? 6 A. Okay. Yup. 7 Q. It is a little challenging 8 for me. So just give me one second and 9 I'm going to find the document I want to 10 go through. 11 --- 12 (At this time, a document 13 was shown on the screen.) 14 --- 15 BY MR. ZEIGER: 16 Q. Can you see this document? 17 A. I can. 18 Q. Are you familiar with this? 19 A. Yes. 20 Q. I'm going to indicate for 21 the record that this document is a 22 10-page document. And at the bottom 23 right-hand corner of the first page it is 24 PSP0001.</p>
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<p>1 the car cameras. 2 Q. So there's some type of 3 cameras with the troopers then, right? 4 A. Correct. 5 Q. And you said that the 6 vehicle you were in is called a BearCat? 7 A. Correct. Armored vehicle. 8 Q. Did that vehicle have 9 cameras? 10 A. No. 11 Q. In your review of and as a 12 supervisor that was going on there, do 13 you think any the troopers involved in 14 this job made any mistakes when they went 15 inside the building? 16 MR. BRADFORD: Objection to 17 form. You can answer. 18 THE WITNESS: No. 19 BY MR. ZEIGER: 20 Q. Is there anything that you 21 think that any of the troopers should 22 have done differently? 23 MR. BRADFORD: Objection to 24 form. You can answer.</p>	<p>1 And I'm going put on the 2 record that this is going to go from 0001 3 to 0010, which would be a 10 4 page-document. 5 Why are you familiar with 6 this document? 7 A. This is our -- at that time 8 this was our report to do preplan warrant 9 services. 10 Q. Did you write this document? 11 A. I did not. 12 Q. Do you know who wrote it? 13 A. If you can scroll down to 14 the bottom of this. It would have been 15 John Chulock, which is the overall team 16 leader for this -- this individual job. 17 And we all take -- so I talked before we 18 have a preplan crew that comes up. 19 Everyone works on the 20 certain part of it. So I may -- I may 21 have done part of this page, this page 1 22 or the last page I may have had part in 23 typing. But its overall report is 24 completed by John Chulock. It kind of</p>

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<p>1 helps get out the paperwork done and 2 things like that. 3 Q. Did you review this document 4 in preparation for your deposition today? 5 A. I did. 6 Q. Did you note any mistakes on 7 it, errors or omissions? 8 A. No. 9 Q. So I'm going to go -- I'm 10 going to go to the top of the document of 11 this page here. And it says Warrant 12 service plan. 13 Did you -- I'd like to ask 14 you what a warrant service plan is, but 15 if you think you've already answered it I 16 don't want you to repeat yourself. 17 Can you tell me what a 18 warrant service plan is? 19 A. Just planning to conduct a 20 warrant service, either search warrant, 21 arrest warrant or combination thereof. 22 Q. And this was a combination 23 thereof, correct? 24 A. I don't -- think it was just</p>	<p>1 paragraph here. It says On 2/8/18 at 2 1300 hours Detective Michael Enstrom of. 3 Northampton County Drug Task 4 Force contacted SERT east requesting 5 assistance with serving a search warrant 6 at 340 Old Allentown Road, Bangor 7 Township, Northampton County? 8 Is that all accurate? 9 A. Yes. 10 Q. And 340 Allentown Road, 11 that's the subject of where the warrant 12 was to be executed? 13 A. Yes. 14 Q. Enstrom related his task 15 force has an ongoing investigation to the 16 distribution to crystal meth that started 17 in October 2017. Do you remember that? 18 A. Yes. 19 Q. Hold on one second. Did you 20 find any crystal meth? 21 A. I don't know. We don't take 22 part in the searches. We secure the 23 residence to make sure it's safe for the 24 investigating agency and then we depart.</p>
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<p>1 a search warrant. I don't think they had 2 arrest warrant at this time. It would 3 have been a search warrant only. 4 Q. And I notice there's some 5 boxes here. It says Weapons, handguns, 6 ARs, .50-Cal. What does that mean? 7 A. During our intel workup of 8 this, weapons that could possibly be in 9 the residence or occupations thereof 10 could have access to. 11 Q. Did you have any information 12 that any of the occupations illegally 13 possessed any firearms? 14 A. I couldn't hear the last -- 15 you said legally or illegally? 16 Q. Illegally? 17 A. I don't recall at this time. 18 MR. BRADFORD: Brian, can 19 you up your volume a little bit? 20 BY MR. ZEIGER: 21 Q. And the next one is checked 22 off it says Search warrant? 23 A. Correct. 24 Q. I'm going to go through this</p>	<p>1 Q. Did you personally see any 2 crystal meth? 3 A. I did not. 4 Q. Did any trooper tell you 5 that they personally saw crystal meth? 6 A. I do not remember. 7 Q. During their investigation 8 they used the CI to make four controlled 9 buys from the main subject of their 10 investigation, Mark Anglemeyer, white 11 male, 52. Is that accurate? 12 A. Yes. 13 Q. Did you come in contact with 14 Mark Anglemeyer? 15 A. I did not. 16 Q. Enstrom explained three 17 structures on the property that he is 18 requesting SERT handle, the main 19 residence, a trailer and a garage. 20 Do you remember that? 21 A. Yes. 22 Q. Did you send teams to all of 23 those buildings? 24 A. Yes, one team to the main</p>

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<p>1 residence and then another team who 2 secured the garage first and then went to 3 the trailer second. 4 Q. When you got to the scene 5 were you closer to one or the other or 6 were you kind of in-between both? 7 A. The residence, the main 8 residence. 9 Q. And I've been to the 10 property for my own sort of site 11 inspection. You know, when you pull into 12 the driveway the main residence is on the 13 left, correct? 14 A. Correct. 15 Q. And then you have to go a 16 little further down to get to where the 17 garage is, right? 18 A. I believe so, yes. 19 Q. So when you pulled into the 20 driveway, therefore, you stopped the 21 BearCat right near the main residence? 22 A. Yes. 23 Q. And you were the driver and 24 operator the BearCat?</p>	<p>1 them or have conceal carry permits. Do 2 you remember that? 3 A. Yes. 4 Q. Did you have a chance to run 5 any of these people before you went in? 6 A. I -- me personally, no, but 7 -- the people doing the intel did. 8 Q. Hold on one second, please. 9 --- 10 (At this time, a discussion 11 was held off the record.) 12 --- 13 BY MR. ZEIGER: 14 Q. So I didn't hear your last 15 answer. Did you say that you were able 16 to confirm that these -- that the people 17 had registered firearms and/or conceal 18 carry permits before you went in? 19 A. Yes. The negotiators 20 usually run our intel stuff for us 21 through the use of our basic intel 22 center. And there was confirmation that 23 people did have weapons registered to -- 24 or handguns registered to them or conceal</p>
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<p>1 A. No, I've been the passenger. 2 Most of the time I sit in the front 3 passenger seat, but sometimes I sit in 4 the back. I can't remember where I was 5 at this time. 6 Q. I understand. Enstrom 7 further related that all of the buyers 8 had come from the trailer, but Mark 9 Anglemeyer resides in the main residence. 10 Do you remember that? 11 A. Correct. 12 Q. And Enstrom reported that he 13 believes there's eight adults and a 14 teenager that live inside the residence. 15 Do you remember that? 16 A. Yes. 17 Q. Can you see? 18 A. Yup. I just can't see the 19 right side, our pictures are kind of 20 covering the right side of the page. 21 Q. How about now? 22 A. Perfect. 23 Q. Enstrom said, Most of the 24 adults have either handguns registered to</p>	<p>1 carry permits or both. 2 Q. Now, if they have a license 3 to carry, it means they don't have a 4 criminal record, right? 5 A. I would assume so, yes. 6 Q. So when you find out that 7 people have a valid license to carry, 8 does that change your thinking regarding 9 going into a property? 10 A. No. 11 Q. Why is that? 12 A. Why does that not change our 13 opinion? Because there's still a firearm 14 accessible -- could be a firearm 15 accessible by occupants within. Just 16 because they don't have a criminal record 17 doesn't mean they're not willing or could 18 possibly do something with that firearm. 19 Q. Right. And so -- uniform 20 that the -- I know I asked you this 21 earlier, but the uniform that people come 22 in, is it like a camouflage uniform? 23 A. Yeah, we wear -- at that 24 time we were wearing MultiCam camouflage</p>

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<p>1 vest, but we had like olive drab green 2 helmets. 3 Q. And it looks like military 4 sort of? 5 A. Yes. 6 Q. And you entered this house 7 at 6:00 a.m. in the morning? 8 A. Right around there. It 9 wasn't before 6:00, so... 10 Q. So I mean -- so you're going 11 into a house in military style uniforms 12 with no names or identification on them 13 with no cameras at 6:00 a.m. in the 14 morning and the people have guns so 15 you're worried someone is going maybe -- 16 A. But identification. I never 17 said we don't have identification. 18 There's -- the shields that they carry, 19 they say state police. The 20 identification on the uniforms that say 21 state trooper. We have a PA system 22 identifying ourselves, presence of the 23 purpose, individuals that are going in 24 are identifying themselves present and</p>	<p>1 criminal history of selling drugs, 2 assault, resisting arrest, escape, 3 fleeing and alluding. You had that 4 information from Enstrom as well, right? 5 A. Correct. And that was also 6 in our intel brief so I'm assuming our 7 guys was able to verify that through 8 their workup on intel. 9 Q. And a couple lines down here 10 it says, Notify NT coordinator. What 11 does that mean? 12 A. That's myself, when I was 13 notified. So on rare occasions one of 14 the assistant coordinators would get 15 notified or if it comes from PSP one of 16 the guys at the station or on our 17 tactical team and they'll contact me so 18 as the time that the coordinator is 19 notified of the request. 20 Q. And then it says, Division 21 director notified division director next. 22 Who's that? 23 A. That would be the captain of 24 our operation's section.</p>
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<p>1 purpose, they're telling people to either 2 get on the ground, show your hands, et 3 cetera. 4 So we are identifying 5 ourselves. We do have identification, 6 just not per se the name, the individual 7 name. 8 Q. And as a result though, 9 you're worried someone's going to try to 10 shoot at you like they're being 11 burglarized or something. So even though 12 they're law abiding citizens with valid 13 carry permits you're still worried you're 14 going to be shot at, is that? 15 A. It's a possibility, yes. 16 Q. Next sentence, The CR 17 reported seeing several guns in the 18 residence and several of the adults 19 carrying guns on their person. That you 20 got from Enstrom though, you didn't have 21 any independent evidence of that, right? 22 A. Correct. I just got that 23 from the investigators. 24 Q. And Mark Anglemeyer had a</p>	<p>1 Q. And do you know -- 2 A. That might be the -- my 3 notification goes I get requested, if it 4 meets -- when I speak to them on the 5 phone. If it meets on face value our 6 criteria that we can do it at least 7 further -- go along with the meet in 8 person, then I'll contact my boss who's a 9 lieutenant and then run it by him and 10 then they'll give an approval. 11 If he's not there I go 12 through the captain. But it ends up 13 going through the captain regardless 14 either through me or my lieutenant who is 15 my next rank above me. 16 Q. And then the next line says, 17 Other notifications RISSafe? 18 A. It would be RISSafe if it's 19 just a deconfliction thing that to make 20 sure two different -- I'll say for 21 instance I'll say the ATF was also 22 investigating this residence or these 23 people and they had something -- that 24 they were going to serve a search warrant</p>

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<p>1 that same day in the morning. It's a 2 just a deconfliction to make sure that's 3 not going to happen. 4 Q. Understood. You don't want 5 two groups of law enforcement converging 6 on the same property at the same time 7 that don't know the other one's going to 8 be there? 9 A. Correct. Also works for 10 with investigators. They will say, hey, 11 someone also has a RISSafe pull on this, 12 you guys need to deconflict was going on 13 just so just we're information sharing. 14 Q. I'm going to go to the next 15 page. Okay? 16 A. Okay. 17 Q. Here at the top of page 2 18 there just looks to be like a checklist. 19 And I'm guessing these are just the names 20 of troopers that went in? 21 A. Not that went in, that were 22 part of this warrant service in one way 23 or another. So if you look at that Alfa, 24 Bravo, Charlie, Delta, Echo 1, Echo 2,</p>	<p>1 for our SERT west team. Since we had 2 multiple structures to clear we brought 3 out who was available for our west team. 4 So the same thing, Kilo, Lima, Mike, 5 November, Echo 3, Echo 4 are the tactical 6 unit. They'll tell -- negotiators. And 7 then Powell would be the -- is the SERT 8 west coordinator, my equal for the west 9 team. And he would have been overseeing 10 the garage and trailer. 11 Q. Going to page 4. This -- 12 where it says Description of structure 13 this says The main residence is a bilevel 14 style home with tan siding and multiple 15 additions. The main part of the 16 residence faces Old Allentown Road. The 17 primary entry door is located on the one 18 side of the main residence and is 19 situated on a small porch. The numbers 20 340 are on the front of said porch roof. 21 The driveway leads from the 22 main road to the foreside where there is 23 a small white fence that encompasses a 24 patio which leads to the foreside door.</p>
Page 39	Page 41
<p>1 they are the tact unit members, either 2 entry or counter snipers. Then if you go 3 down to Foxtrot, Golf, they're the 4 negotiators. And then the coordinator, 5 additional members would be myself and 6 Mallon is overall in charge for the 7 negotiation section. And then our 8 medics, they are just the medics that 9 came. We have subcontract medics. 10 Q. And the medics they don't go 11 into until after everything's secure? 12 A. Correct. They wouldn't go 13 in unless we call for them. 14 Q. And in this case you did 15 that for an elderly woman that was in the 16 property? 17 A. Yes. 18 Q. I'm going to scroll down. 19 Okay? 20 A. Okay. 21 Q. Can you tell us -- we're on 22 page 3 now. Can you tell us what this 23 is? 24 A. This would be the line up</p>	<p>1 This door is a glass French door. 2 Also included on this search 3 warrant is a single wide trailer and a 4 large garage which are located on the 5 south side of the property. 6 Did you -- is all that 7 accurate? 8 A. Yes, which I can remember, 9 it is. 10 Q. Did you get that information 11 before or after the warrant was executed? 12 A. Prior to. Well, I can't 13 remember the way exactly this one went. 14 We're probably 300 plus jobs ago for this 15 one. But for this when we do our brief 16 with investigators they tell us about the 17 house, they describe it, look at 18 photographs, videos, we'll pull up 19 anything on Google Earth, anything we 20 can. 21 Then we eventually do a 22 drive-by with investigators so they could 23 point out the residence to us. So 24 between that information they're giving</p>

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<p>1 us and then what they're pointing out to</p> <p>2 us we can verify it's the correct house.</p> <p>3 And so our guys that do the drive-by, we</p> <p>4 will get the description on this and</p> <p>5 that's what they'll put down.</p> <p>6 Q. It says method of operation,</p> <p>7 knock and announce. And then next to it</p> <p>8 is contain and hail and then vehicle take</p> <p>9 down.</p> <p>10 Can you explain what knock</p> <p>11 and announce is?</p> <p>12 A. Knock and announce search</p> <p>13 warrant, knock and announce your</p> <p>14 presence. Warrant service.</p> <p>15 Q. Did they do that in this</p> <p>16 case?</p> <p>17 A. Yes. And like I said before</p> <p>18 that, with that from the BearCat --</p> <p>19 normally from the BearCat is sometimes</p> <p>20 one of the vans, but 90 percent of times</p> <p>21 the BearCat, they're overhead lights for</p> <p>22 identification purposes and announcements</p> <p>23 are coming from the BearCat and the PA</p> <p>24 system.</p>	<p>1 Q. I'm going to scroll down.</p> <p>2 Okay?</p> <p>3 A. Yes, sir.</p> <p>4 Q. CI reported seeing several</p> <p>5 guns in the residence and several of the</p> <p>6 adults carry guns on their person. Also</p> <p>7 several videos on Facebook show several</p> <p>8 family members shooting a variety of guns</p> <p>9 on the property to include an AR and a</p> <p>10 .50 cal rifle. CI reports the property</p> <p>11 has an extensive surveillance system.</p> <p>12 You had all that information</p> <p>13 in advance, correct?</p> <p>14 A. Yes, sir.</p> <p>15 Q. Scrolling down to page 6.</p> <p>16 It says on this page Announcement from</p> <p>17 vehicles. So is this what you just</p> <p>18 described?</p> <p>19 A. Yes.</p> <p>20 Q. It says Announcement will</p> <p>21 come from the BearCat, Residence of 340</p> <p>22 Old Allentown Road, this is the State</p> <p>23 Police. We have a search warrant for the</p> <p>24 residence. The announcement will be</p>
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<p>1 Q. I'm going to scroll down.</p> <p>2 Okay?</p> <p>3 A. Yup.</p> <p>4 Q. What is -- this page uses</p> <p>5 the word staging a lot. Can you tell me</p> <p>6 what this page is about?</p> <p>7 A. Just more of description of</p> <p>8 where the guys are going to stage at for</p> <p>9 the briefing. Staging for the local EMS</p> <p>10 we have all the tactical medics go direct</p> <p>11 with local EMS and have them on standby.</p> <p>12 Some are within a close range if they</p> <p>13 need to respond to treat anyone that</p> <p>14 could have been injured, ourselves,</p> <p>15 anyone in the residence.</p> <p>16 Primary entry point is where</p> <p>17 the primaries -- where we want to make</p> <p>18 entrance. Secondary is if the primary</p> <p>19 doesn't work we have a backup plan. And</p> <p>20 abort plan is basically set for -- we</p> <p>21 take gunfire at the door or you can't</p> <p>22 make entrance into the residence for one</p> <p>23 reason or another we do a -- set up a</p> <p>24 perimeter and do a contain and hail.</p>	<p>1 repeated until the residence and subjects</p> <p>2 are secure; is that right?</p> <p>3 A. Correct.</p> <p>4 Q. When you say repeated, is it</p> <p>5 a recording or you just keep saying it</p> <p>6 over and over again?</p> <p>7 A. We keep saying it over and</p> <p>8 over again. And it varies so -- we do it</p> <p>9 different ways. I mean -- we just did</p> <p>10 one where the majority of the home</p> <p>11 residents were Spanish only speaking. So</p> <p>12 I had the negotiator do it twice in</p> <p>13 Spanish then once in English and just</p> <p>14 keep repeating that in order the whole</p> <p>15 time.</p> <p>16 Q. And then next here it says</p> <p>17 Vehicle East Tac, Driver Johnson,</p> <p>18 Passenger, Chulock, team leader, Chulock</p> <p>19 and it has 1 through 9. What does this</p> <p>20 mean?</p> <p>21 A. It's just an order that</p> <p>22 they're going to be going into the</p> <p>23 residence via that or order they're going</p> <p>24 to be coming out of the vehicle for the</p>

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<p>1 warrant service. So as you break it down 2 for this -- east utility, everyone to the 3 one side which is the front of the house 4 for this case and making entry through 5 that front door. 6 Q. I'm going to scroll down. 7 A. Okay. 8 Q. And then what is this second 9 group here, who are these folks? 10 A. So second group, the first 11 guy Atkinson, he would have been coming 12 out of that vehicle and meeting up with 13 the members from the top vehicle, the 14 utility van. But everyone else was from 15 this vehicle would have been lined up 16 going to entry point on the foreside, 17 which would have been the right side of 18 the house if you're looking at it from 19 the road parallel to the driveway. 20 Q. And I notice next number 8 21 there is someone named King next to it. 22 Do you see that? 23 A. Correct. 24 Q. Is King African American?</p>	<p>1 MR. BRADFORD: Objection to 2 form. 3 BY MR. ZEIGER: 4 Q. And you never had a 5 debriefing with King where he told you 6 some other troopers were using too much 7 force inside the house? 8 A. No. 9 Q. If King had told you that, 10 what would you have done? 11 MR. BRADFORD: Objection. 12 You can answer. 13 THE WITNESS: If King told 14 me that what would I have done? 15 BY MR. ZEIGER: 16 Q. Yeah, if King said to you so 17 and so trooper was too aggressive inside 18 there what would you have done as a 19 result of that conversation? 20 A. I would have to further 21 address what happened and take it from 22 there. I can't really answer it. 23 Q. In this case did you do any 24 further investigation on any of the</p>
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<p>1 A. He is. 2 Q. Is he the only African 3 person that's listed on any of these 18 4 people on this page? 5 A. Correct. 6 Q. Did you have an opportunity 7 to debrief with King? 8 A. He would have been part of 9 the overall debrief, correct. 10 Q. Did you speak with him? 11 A. I'm not sure if he spoke or 12 didn't speak at the debrief. 13 Q. Are you aware that two of 14 the plaintiffs in this case claimed that 15 when they were being assaulted by 16 troopers that King stepped in and helped 17 them? 18 MR. BRADFORD: Objection to 19 form. You can answer. 20 BY MR. ZEIGER: 21 Q. And told the -- told the 22 other troopers they were using too much 23 force, are you aware of that? 24 A. No.</p>	<p>1 troopers that were inside the house? 2 A. I had to do a use of force 3 report. We call it a blue team entry. 4 Kind of goes to internal affairs. So for 5 us any type of use of force that creates 6 injury or I believe suspected injury that 7 maybe wasn't reported or if we throw -- 8 if we use a noise-flashing diversionary 9 device inside a house -- most of them 10 come from barricades generally if we 11 shoot -- if we use chemical emissions in 12 the house, if we use an explosive breach 13 on a house or whatever structure we're 14 doing we have to do a use of force or 15 somebody gets shot with less lethal, with 16 lethal rounds and things like that. 17 Q. Who was the trooper in this 18 case that you did the blue sheet on? 19 A. Blue team would have 20 Painter, was a shield I believe Schimp 21 and I can't remember if who, if any, I 22 listed as witnesses. I do not recall. 23 Q. Why did you do that in this 24 case?</p>

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<p>1 A. Because the female that was 2 claiming back injury and had some chipped 3 teeth I believe was Painter -- Trooper 4 Painter came into contact with her with 5 his shield and then Schimp would have 6 been his -- eventually through the 7 debrief figured out that Schimp ended up 8 being his cover person, try to make entry 9 into a room. 10 Q. I'm going to scroll to the 11 next page. Okay? 12 A. Yes, sir. 13 Q. And who are these folks here 14 at the top? 15 A. 1 through 6? 16 Q. Yes, sir. 17 A. Garipoli, we have a CP log 18 that they kind of keep ongoing log of 19 what's going on. Coordinator is myself, 20 Heckman would have been the medic in the 21 back of the BearCat. Patillo would have 22 been -- he's one of our counter snipers, 23 so he's outside coverage on the one 24 forecorner of the structure and then</p>	<p>1 about before doing the garage and the 2 trailer, they were assigned to that part 3 of the property. 4 Q. The three people here at the 5 bottom, who are these three? 6 A. Julius is a negotiator who 7 is now a drone pilot. So he kept a log 8 for the garage and the trailer. Moy 9 would have been outside coverage. He was 10 a counter sniper. So outside coverage 11 containment. And then Albertson would 12 have been the medic in the BearCat for 13 the residence. 14 Q. Understood. Scrolling more 15 here. What is this page? 16 A. Just an overall briefing of 17 the preplan, the plan itself. I'm going 18 to put my coat on. My office is 19 freezing. Kind of like overall report of 20 everything that we came up with during 21 the preplan for this, kind of summarize 22 it. 23 Q. The first paragraph seems 24 like the same first paragraph on an</p>
Page 51	Page 53
<p>1 Falcone and Pierotti were point covers 2 coming out and meeting up with the second 3 van. I think it was a tac van, east tac 4 van. 5 Q. Scrolling down again, who 6 are these people listed 1 through 8? 7 A. They were all counter 8 snipers that were used for outside 9 coverage containment. 10 Q. And then Bobella is just a 11 medic? 12 A. Correct. He would have been 13 -- we try to keep a medic in the BearCat 14 and then a medic in a trail vehicle. 15 Q. I'm going to scroll down. 16 Okay? 17 A. Yes, sir. 18 Q. This is page 8. It says the 19 directions at the top and then again it 20 says announced and then now we have new 21 people listed 1 through 7. Who are these 22 folks? 23 A. They would have been 24 individuals going to and -- I talked</p>	<p>1 earlier page? 2 A. Yeah, same thing as page 3 one. 4 Q. I'm going to skip that 5 paragraph. 6 A. Okay. 7 Q. I'm going to scroll down a 8 little and then this second paragraph 9 just talks about the people inside the 10 house, their prior criminal records and 11 who you believe owns firearms and all 12 that, correct? 13 A. Correct. 14 Q. The next paragraph says, It 15 should be noted that the family is not 16 police friendly and it is believed that 17 the property is equipped with some type 18 of surveillance system and alarms which 19 allow the property owner to monitor the 20 property. 21 Where did you get that 22 information from? 23 A. That had come from the 24 detectives that requested us or local PD</p>

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<p>1 that covers that area. 2 Q. Did you find any evidence of 3 any surveillance system when you did this 4 job? 5 A. I don't recall. 6 Q. The next paragraph talks 7 about some dogs. The next paragraph 8 talks about the requests. And then the 9 next paragraph talks about I guess your 10 sort of -- let me scroll up. 11 A. Can you scroll back a couple 12 pages? Do you care if I refer to my 13 report? I can probably find it a lot 14 quicker reference to surveillance 15 systems. 16 Q. Please do. Can you tell us 17 what information you had regarding any 18 surveillance? 19 A. Nothing. Sometimes in some 20 of the questions it will list if they saw 21 it. If -- during the drive-by they 22 actually saw cameras or something like 23 that. When I briefed over I missed that, 24 but it wasn't on there.</p>	<p>1 secondary, abort plans, gun fire, things 2 like that. 3 Q. And at the bottom it says, 4 Result: Eight adults including Mark 5 Anglemeyer and one 17 year old were 6 detained as a result of this search 7 warrant. Several weapons to included a 8 sawed off semi-automatic 10-22 Remington 9 rifle with a homemade suppressor and box 10 of homemade suppressor parts were 11 observed in plain view? 12 A. Correct. 13 Q. Why did you write -- why did 14 you add that to the report? 15 A. We always put results if we 16 have anything for things that are plain 17 view or investigators get back to us 18 right away with what they found overall. 19 Q. And in that paragraph you 20 did not put anything about any 21 methamphetamine, correct? 22 A. Correct. 23 Q. And you did not put anything 24 on there about Ada Anglemeyer having a</p>
Page 55	Page 57
<p>1 Q. So in this case there's no 2 information that they had them, correct? 3 A. I can't recall either way. 4 We have information on this. It says 5 there is -- sometimes we can see them, 6 sometimes we can't. So like for our 7 planning purposes, I would plan for -- 8 they do have some type of surveillance 9 system. 10 Q. I'm going to scroll down. 11 A. Yes, sir. 12 Q. Then here on the bottom of 9 13 goes to the top of 10 it says SERT east 14 and west. Do you see that paragraph? 15 A. Yes, sir. 16 Q. And so that talks about the 17 actual plan, that's actually like the 18 plan of what's going to happen? 19 A. Yeah, that just talks about 20 where we're going to meet, do the 21 briefing and then basically do the 22 rehearsal. We rehearse everything kind 23 of like glass boxes is what we call it. 24 Then we practice rehearsals, entries,</p>	<p>1 firearm on her person correct? 2 A. Correct. 3 Q. And you did not put anything 4 on here about Joseph Kluska having a 5 firearm on his person, correct? 6 A. Correct. 7 Q. That's the end of this 8 10-page document. Okay? 9 A. Yes, sir. 10 Q. Earlier you -- I asked you 11 about if you filled out use of force 12 report for any of the officers. And you 13 mentioned the one officer I think his 14 name was Painter, you said that you 15 filled it out because he used his shield 16 in some way. 17 Do you remember that part of 18 the deposition today? 19 A. Yes. 20 Q. And so can you describe for 21 us how he used his shield to the best of 22 your knowledge? 23 A. The best of my knowledge the 24 way I remember it is they were clearing</p>

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<p>1 through the lower level of the structure. 2 So they would have made entry what we 3 refer to as the foreside. So it would 4 have been looking at the front, the right 5 side of the house and working their way 6 towards the back of the residence trying 7 to push deep as fast as we can and kind 8 of clear back from there. 9 And if I remember correctly 10 she was repeating their entrance into a 11 room and he used his shield to push her 12 out of the way to make entry into that 13 room after giving commands which weren't 14 followed. 15 Q. Are troopers permitted to 16 use their shield in that way? 17 A. Yes. 18 Q. Were you interviewed by 19 anyone in regard to the amount of force 20 that he used on that day? 21 A. I do not remember if I was 22 interviewed for the internal affairs 23 investigation. 24 Q. Did you speak to anyone</p>	<p>1 would have been Corporal Johnson. 2 MR. BRADFORD: Brian, did we 3 mark the first document or do you 4 want to? 5 MR. ZEIGER: The first 6 document we can mark as Rowland-1. 7 MR. BRADFORD: And we'll 8 make this Rowland-2. 9 MR. ZEIGER: Yes, sir. And 10 I apologize to the court reporter 11 for not having them premarked and 12 upload in the system and troubles. 13 Because of COVID no one's in my 14 office but me. 15 --- 16 (At this time, Rowland-1 and 17 Rowland-2 was marked for 18 identification.) 19 --- 20 BY MR. ZEIGER: 21 Q. Who filled out this document 22 if you know? 23 A. Prepared by Corporal 24 Johnson.</p>
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<p>1 about that? 2 A. About what? I don't 3 remember if I was interviewed or not. I 4 don't know how it stands. If I was 5 interviewed, I spoke to someone. If I 6 wasn't interviewed, I didn't. 7 Q. Did you speak to Painter 8 about it? 9 A. I told them it was going to 10 be a blue team entry done. 11 Q. What did he say? 12 A. I don't remember, probably 13 okay. 14 Q. I'm going to pull up another 15 document. We're getting towards the end. 16 I promise. 17 A. No worries. I'm paid till 18 3:00 anyway. 19 Q. Do you see this document? 20 A. I do. 21 Q. Do you know what this? 22 A. Yes, it's our intel report 23 that our -- whoever negotiator is that we 24 have assigned at that point. So this</p>	<p>1 Q. And do you know was this 2 filled out before or after the raid? 3 A. Before. 4 Q. Did you have an opportunity 5 to review this document before your 6 deposition today? 7 A. Yes. 8 Q. Were there any mistakes or 9 was there omissions in this document? 10 A. Not that I can see. 11 Q. Just give me one second. So 12 what's the purpose of having this SERT 13 intelligence brief before this job 14 begins, can you tell us? 15 A. Just to make sure everyone's 16 aware of what's going on. To make sure 17 information that the best we could verify 18 SERT investigators have told us. They'll 19 do their own independent workup. This is 20 read at the briefing, the photographs are 21 displayed. 22 Q. And this last group of 23 questions here. Do you know the name of 24 the trooper who had contact with a man</p>

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<p>1 named Jeffrey Anglemeyer? 2 A. I don't. 3 Q. Do you know the name of the 4 trooper who had contact with a man with 5 Richard Anglemeyer? 6 A. I do not. 7 Q. And is there anything else 8 that I didn't ask about this case that 9 you would like to put on the record 10 today? Do you have any information about 11 any other subject? 12 MR. BRADFORD: Objection to 13 form. You can answer. 14 THE WITNESS: I do not. 15 BY MR. ZEIGER: 16 Q. Thank you very much, 17 Sergeant. Please be safe. 18 --- 19 CROSS-EXAMINATION 20 --- 21 By MR. BRADFORD: 22 Q. Sergeant, real quick. The 23 Rowland-2, that document we were just 24 looking, the intelligence brief -- and</p>	<p>1 Q. And you provided me with all 2 those recordings from that briefing? 3 A. Yes, or someone did. 4 MR. BRADFORD: And Brian, 5 I'll represent to you that I 6 provided all those in discovery. 7 That's all I got. 8 --- 9 REDIRECT EXAMINATION 10 --- 11 BY MR. ZEIGER: 12 Q. I'm going to follow up, 13 Sergeant. Sorry about that. 14 A. No problem. 15 Q. And you see this one here, 16 Richard Conrad Anglemeyer? 17 A. I do. 18 Q. This page has been 19 previously been marked as PSP25, and this 20 one says Richard has no criminal history. 21 Do you see that? 22 A. Yes. 23 Q. So just because someone's on 24 this list doesn't mean they have a</p>
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<p>1 I'll put it on my screen here. Is it 2 fair to say that each of the individuals 3 included on this document that it 4 contains information about their criminal 5 histories? 6 A. Yes. 7 Q. So in addition to any gun 8 ownership records it would also contain 9 their criminal histories for each of 10 these individuals? 11 A. Yeah, they'll go into 12 specifics for criminal histories. Mostly 13 for -- part of meeting our criteria at 14 some points, use of force, if they have a 15 violent criminal history, et cetera. 16 Q. So the troopers are informed 17 of the criminal history that of each of 18 the individuals that are expected to be 19 there? 20 A. Correct. 21 Q. And the briefing that you 22 conducted at the barracks, was that video 23 recorded? 24 A. Yes.</p>	<p>1 criminal history; isn't that correct? 2 A. Correct. For these reports 3 they'll cover anyone they know or we 4 believe that's going to be in the 5 structure. I know this report what it 6 is. If they have a criminal history, 7 they'll list what it is. If they don't 8 have a criminal history, they'll list 9 they don't have a criminal history. 10 Q. So this report is a list of 11 the known occupants of the house, 12 correct? 13 A. Yes, or acquaintances that 14 could possibly be there. 15 Q. It's not if you're on the 16 list you have a criminal history? 17 A. Correct. 18 Q. That's misstated, correct? 19 A. Correct. 20 Q. I have nothing further. 21 (Witness excused.) 22 (Deposition concluded at 23 12:41 p.m.) 24</p>

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CERTIFICATION

I, hereby certify that the
proceedings and evidence noted are
contained fully and accurately in the
stenographic notes taken by me in the
foregoing matter, and that this is a
correct transcript of the same.

Court Reporter - Notary Public

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34:13	ALEXAND...	Arch 2:9	basically	Brian 2:3	carrying	closer 30:5	contact 17:4
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access 12:12	allow 53:19	ARs 27:6	42:18,19,21	62:24	39:14 42:16	26:21,22	61:24 62:4
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